

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN  
DISASTER SITE LITIGATION

**21 MC102 (AKH)**  
NOTICE TO PRODUCE DOCUMENTS  
PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 34

To: ENVIROTECH CLEAN AIR, INC.  
c/o Heather Smar, Esq.  
Friedman, Harfenist, Kraut & Perlstein, LLP  
3000 Marcus Avenue, Suite 2E1,  
Lake Success, NY 11042  
[hsmar@fhkplaw.com](mailto:hsmar@fhkplaw.com)

**PLEASE TAKE NOTICE**, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 225 Liberty Street, 2 WFC, as referenced in the deposition of Ronald Fallon, on August 21, 2012, at or about page as referenced below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merrill Lextranet.

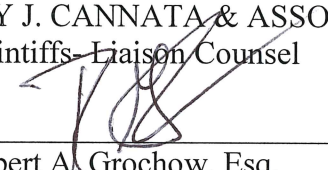
1. Documents relating to the asbestos awareness, 40 hour hazmat course and other courses taken with regard to the handling and clean-up of hazardous substances taken by Mr. Fallon before or after September 11, 2011 including but not limited to documents containing the dates during which these courses were taken and any licenses or certifications that were earned as a result of the course, as referenced on or about page 18 in the above referenced deposition.

2. The names and index numbers of the plaintiffs in lawsuit against or involving Envirotech Clean Air, Inc. as referenced on or about page 70 in the above referenced deposition.
3. Environmental Safety health Performance Appraisals prepared by Envirotech Clean Air, Inc. in reference to work at 225 Liberty Street, 2WFC , as referenced on or about page 74 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation.

Dated: New York, New York  
February 27. 2013

GREGORY J. CANNATA & ASSOCIATES  
Plaintiffs- Liaison Counsel

By:   
Robert A. Grochow, Esq.  
233 Broadway, 5<sup>th</sup> Floor  
New York, New York 10279-0003  
(212) 553-9205